

EXHIBIT 3

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA

CIVIL ACTION NO: 2:24-CV-00490

-----X
IN THE MATTER OF COEYMANS MARINE
TOWING, LLC D/B/A CARVER MARINE
TOWING AS OWNER AND OPERATOR OF M/T
MACKENZIE ROSE, (IMO NO. 8968765) HER
CARGO, ENGINES, BOILERS, TACKLE, EQUIPMENT,
APPAREL, AND APPURTENANCES, ETC., IN REM,
("M/T MACKENZIE ROSE"),

PETITIONING FOR EXONERATION FROM OR
LIMITATION OF LIABILITY IN ALLISION WITH
NORFOLK AND PORTSMOUTH BELT LINE RAILROAD
COMPANY MAIN LINE RAILROAD BRIDGE
(THE "BRIDGE") OCCURRING JUNE 15, 2024 IN
AND ABOUT THE ELIZABETH RIVER, VIRGINIA.

-----X

April 30, 2025
10:32 a.m.

AN IN PERSON DEPOSITION of JARKEIS
MORRISEY, a Defendant herein, taken by the
respective parties, pursuant to Order, held
at the offices of 405 Lexington Avenue, New
York, New York, before Larin Kaywood, a
Notary Public for and within the State of
New York.

JOB NO.: 112264

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<p>1 A P P E A R A N C E S:</p> <p>2</p> <p>3 CLYDE & CO US LLP</p> <p>4 Attorneys for Coeymans Marine Towing, LLC</p> <p>5 30 S. Wacker Drive, Suite 2600</p> <p>6 Chicago, IL 60606</p> <p>7 BY: JAMES H. RODGERS, ESQ.</p> <p>8 MICHAEL ROMAN, ESQ.</p> <p>9 E-mail: Michael.roman@clydeco.us</p> <p>10 James.rodgers@clydeco.us</p> <p>11</p> <p>12 CRENSHAW, WARE & MARTIN, P.L.C.</p> <p>13 Attorneys for Defendant Norfolk</p> <p>14 Portsmouth Belt Line Railroad Company</p> <p>15 150 W. Main Street Suite 1500</p> <p>16 Norfolk, Virginia 23510</p> <p>17 BY: JAMES L. CHAPMAN, ESQ.</p> <p>18 E-mail: Jchapman@cwm-law.com</p> <p>19</p> <p>20 SINNOT, NUCKOLS & LOGAN, P.C.</p> <p>21 Counsel for Evanston Insurance Company,</p> <p>22 S/s/o Norfolk and Portsmouth Belt Line</p> <p>23 Railroad Company</p> <p>24 13811 Village Mill Drive</p> <p>25 Midlothian, Virginia 23114</p> <p>BY: MARK C. NANAVATI, ESQ.</p> <p>CHRISTOPHER JONES, ESQ.</p> <p>E-mail: Mnanavati@snllaw.com</p> <p>MR. CANNON MOSS, Norfolk & Portsmouth</p> <p>Belt Line Railroad</p>	<p>1 INDEX</p> <p>2 EXAMINATION OF JARKEIS MORRISEY</p> <p>3 EXAMINATION BY PAGE</p> <p>4 Mr. Chapman 5</p> <p>5</p> <p>6 - PREVIOUSLY MARKED EXHIBITS -</p> <p>7 Exhibit 1 - picture/ Belt Line Bridge 53</p> <p>8 Exhibit 2 - four photographs 54</p> <p>9 Exhibit 4 - collection of documents 57</p> <p>10 Exhibit 5 - crew list 55</p> <p>11 Exhibit 6 - electronic version of the daily log 62</p> <p>12 Exhibit 11 - statement 51</p> <p>13 Exhibit 23 - Rough Deck Logs 6/12/2024 - 6/16/2024 65</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>
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<p>1 A L S O P R E S E N T</p> <p>2 (VIA VIDEOCONFERENCE)</p> <p>3</p> <p>4 BUTLER WEIHMULLER KATZ CRAIG, LLP</p> <p>5 Counsel for Evanston Insurance Company,</p> <p>6 S/s/o Norfolk and Portsmouth Belt Line</p> <p>7 Railroad Company</p> <p>8 11525 N. Community House Road</p> <p>9 Suite 300</p> <p>10 Charlotte, North Carolina 28277</p> <p>11 BY: ZACHARY M. JETT, ESQ.</p> <p>12 E-mail: Zjett@butler.legal</p> <p>13 CRENSHAW, WARE & MARTIN, PLC</p> <p>14 Attorneys for Norfolk and Portsmouth</p> <p>15 Belt Line Railroad Company</p> <p>16 150 West Main Street, Suite 1500</p> <p>17 Norfolk, Virginia 23510</p> <p>18 BY: W. RYAN SNOW, ESQ.</p> <p>19 MACKENZIE PENNSYL, ESQ.</p> <p>20</p> <p>21 Also Present: INGRID CONTRERAS, VIDEOGRAPHER</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>	<p>1 THE VIDEOGRAPHER: This is the</p> <p>2 beginning of Media Number 1 in the</p> <p>3 deposition of Jarkeis Jamal Bass</p> <p>4 Morrisey in the matter of Coeymans</p> <p>5 Marine, d/b/a Carver Marine Towing</p> <p>6 Link. Case number 224-CV-00490.</p> <p>7 Today's date is Wednesday,</p> <p>8 April 30th, 2025 and the time on the</p> <p>9 monitor is 10:32 a.m.</p> <p>10 My name is Ingrid Contreras</p> <p>11 and I'm the videographer. The court</p> <p>12 reporter is Larin Kaywood. We are</p> <p>13 here with Rosenberg & Associates,</p> <p>14 Inc.</p> <p>15 All of the appearances are</p> <p>16 recorded on the stenograph record.</p> <p>17 The court reporter will now</p> <p>18 swear in the witness.</p> <p>19 J A R K E I S J A M A L B A S S</p> <p>20 M O R R I S E Y, having first been duly</p> <p>21 sworn by a Notary Public for and within the</p> <p>22 State of New York, upon being examined,</p> <p>23 testified as follows:</p> <p>24 THE REPORTER: Can I have your</p> <p>25 first and last name for the record?</p>

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<p>1 THE WITNESS: Jarkeis Jamal</p> <p>2 Bass Morrissey.</p> <p>3 THE REPORTER: Can I have your</p> <p>4 address?</p> <p>5 THE WITNESS: 4723 Baywood</p> <p>6 Drive, Lynn Haven, Florida.</p> <p>7 THE REPORTER: Your zip code?</p> <p>8 THE WITNESS: 32444.</p> <p>9 EXAMINATION BY</p> <p>10 MR. CHAPMAN:</p> <p>11 Q. Good morning, Mr. Morrissey.</p> <p>12 A. Good morning.</p> <p>13 Q. My name is Jim Chapman and I</p> <p>14 represent Norfolk and Portsmouth Belt Line</p> <p>15 Railroad Company in connection with a</p> <p>16 lawsuit in which Carver Marine Towing filed</p> <p>17 to limits its liability arising out of the</p> <p>18 Tug Mackenzie Rose hitting the Belt Line</p> <p>19 Bridge in the Southern branch of the</p> <p>20 Elizabeth River in Virginia on June 15th,</p> <p>21 2024. And we are here to ask you some</p> <p>22 questions about that.</p> <p>23 Do you understand that?</p> <p>24 A. Yes, sir.</p> <p>25 Q. Just so that we kind of lay</p>	<p>1 A. AB deckhand.</p> <p>2 Q. How long were you with Dann</p> <p>3 Marine before you --</p> <p>4 A. Four years.</p> <p>5 Q. Four?</p> <p>6 A. Four years.</p> <p>7 Q. And did you leave Dann Marine</p> <p>8 and go immediately to work for Carver or</p> <p>9 was there some sort of break in that</p> <p>10 employment?</p> <p>11 A. I put my two weeks in and then</p> <p>12 I transferred to Carver.</p> <p>13 Q. Who hired you at Carver?</p> <p>14 A. Brandon, I don't know last</p> <p>15 name.</p> <p>16 Q. Was it an increase in pay?</p> <p>17 A. Yes, sir.</p> <p>18 Q. So what is the work cycle at</p> <p>19 Carver?</p> <p>20 A. Say that again?</p> <p>21 Q. What's the work cycle as a</p> <p>22 deckhand on the Mackenzie Rose. Two weeks</p> <p>23 on, two weeks off?</p> <p>24 A. We do -- we used to do that.</p> <p>25 Now we do three on, three off.</p>
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<p>1 this all out.</p> <p>2 State your full name, please.</p> <p>3 A. Jarkeis Jamal Bass Morrissey.</p> <p>4 Q. You've already provided your</p> <p>5 address. What is your date of birth?</p> <p>6 A. 5/17/99.</p> <p>7 Q. How long have you worked for</p> <p>8 Carver Marine Towing?</p> <p>9 A. A year.</p> <p>10 Q. You're still employed by Carver</p> <p>11 Marine Towing?</p> <p>12 A. Yes, sir.</p> <p>13 Q. Who did you work for before</p> <p>14 Carver Marine?</p> <p>15 A. Dann Marine.</p> <p>16 Q. Your position with Carver</p> <p>17 Marine, please, what is it?</p> <p>18 A. I'm an AB deckhand.</p> <p>19 Q. Are you still assigned to the</p> <p>20 Tug MacKenzie Rose?</p> <p>21 A. Yes, sir.</p> <p>22 Q. What was your position with</p> <p>23 Dann Marine?</p> <p>24 A. The same thing.</p> <p>25 Q. AB --</p>	<p>1 Q. Okay. At the time of the</p> <p>2 allision, you're here to testify about --</p> <p>3 A. It was two weeks on, two weeks</p> <p>4 off.</p> <p>5 Q. All right. And do you know how</p> <p>6 long you had been on the MacKenzie Rose</p> <p>7 prior to --</p> <p>8 A. No, sir. I did not.</p> <p>9 Q. Okay.</p> <p>10 MR. RODGERS: You're going to</p> <p>11 wait till he finishes his question.</p> <p>12 A. Okay, my fault.</p> <p>13 Q. Yeah. Let me just -- sorry. I</p> <p>14 didn't lay up just a quick ground rule.</p> <p>15 It's better if we exercise good</p> <p>16 radio discipline. Let me finish my</p> <p>17 question, you can answer. I'll do my best</p> <p>18 not to interrupt your answer, okay?</p> <p>19 Because she has to take it all</p> <p>20 down and that -- it's super helpful to her</p> <p>21 if we don't talk at the same time.</p> <p>22 So how long have you had a</p> <p>23 merchant mariners document?</p> <p>24 A. For almost five years now.</p> <p>25 Q. Is it coming up on a renewal?</p>

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<p style="text-align: right;">Page 10</p> <p>1 A. I renewed it.</p> <p>2 Q. You did?</p> <p>3 A. (Nodding.)</p> <p>4 Q. When were you first licensed</p> <p>5 then?</p> <p>6 A. 2021, give or take, or 2020.</p> <p>7 Q. Was the deckhand job with Dann</p> <p>8 Marine the first marine employment that you</p> <p>9 had?</p> <p>10 A. Yes, sir.</p> <p>11 Q. Did you have any other</p> <p>12 employment before you went to work for Dann</p> <p>13 Marine?</p> <p>14 A. No, sir.</p> <p>15 MR. CHAPMAN: And for the court</p> <p>16 reporter, Dann is with two Ns,</p> <p>17 D-A-N-N.</p> <p>18 THE REPORTER: Yes.</p> <p>19 MR. CHAPMAN: Yes.</p> <p>20 Q. What's the highest level of</p> <p>21 education you have?</p> <p>22 A. Some college.</p> <p>23 Q. Where'd you graduate from high</p> <p>24 school then?</p> <p>25 A. Mosley High School.</p>	<p style="text-align: right;">Page 12</p> <p>1 Q. When was the last time you saw</p> <p>2 him?</p> <p>3 A. I don't know.</p> <p>4 Q. You haven't seen him?</p> <p>5 A. I haven't seen him in a hot</p> <p>6 minute.</p> <p>7 Q. Can you define "hot minute"?</p> <p>8 Like three months since the allision in</p> <p>9 2015?</p> <p>10 A. I want to say at least a good</p> <p>11 month or so.</p> <p>12 Q. Okay.</p> <p>13 A. Maybe two months.</p> <p>14 Q. Okay. And does your mother</p> <p>15 also live with you or do you --</p> <p>16 A. No.</p> <p>17 Q. Go ahead.</p> <p>18 A. No, she lives in Portugal.</p> <p>19 Q. Portugal. Have you held any</p> <p>20 other position at Carver other than</p> <p>21 deckhand?</p> <p>22 A. No, sir.</p> <p>23 Q. Have you worked on any tug</p> <p>24 other than the Mackenzie Rose while</p> <p>25 employed with Carver?</p>
<p style="text-align: right;">Page 11</p> <p>1 Q. In?</p> <p>2 A. Panama City, Florida.</p> <p>3 Q. There was another member of the</p> <p>4 crew assigned to the Tug Mackenzie Rose at</p> <p>5 the time of the allision who's name was</p> <p>6 James Morrisey.</p> <p>7 Is there any relationship</p> <p>8 between you and James Morrisey?</p> <p>9 A. That's my dad.</p> <p>10 Q. Okay. Do you still live with</p> <p>11 him?</p> <p>12 A. I do.</p> <p>13 Q. And is he still working in the</p> <p>14 marine industry, to your knowledge?</p> <p>15 A. Yes.</p> <p>16 Q. Do you know who he is working</p> <p>17 for?</p> <p>18 A. Centerline.</p> <p>19 Q. Centerline. Is he working as a</p> <p>20 master or mate on one of their boats?</p> <p>21 A. I don't know.</p> <p>22 Q. Does he work like two weeks on</p> <p>23 or two weeks off, or, you know, sort of a</p> <p>24 tug type rotation?</p> <p>25 A. I don't know.</p>	<p style="text-align: right;">Page 13</p> <p>1 A. Say that again?</p> <p>2 Q. Have you worked on any other</p> <p>3 tug than the Mackenzie Rose while you have</p> <p>4 been employed by Carver?</p> <p>5 A. Yes, sir.</p> <p>6 Q. And more than one?</p> <p>7 A. Yes, sir.</p> <p>8 Q. What are you assigned like</p> <p>9 rotation, two weeks on two weeks off crew</p> <p>10 member or just sort of filing in for the</p> <p>11 day?</p> <p>12 A. Signed for two weeks on two</p> <p>13 weeks off.</p> <p>14 Q. Okay. I understand that the</p> <p>15 Mackenzie Road -- Mackenzie Rose was in the</p> <p>16 yard for maybe an inspection, Certificate</p> <p>17 of Conformance inspection, yard evolution,</p> <p>18 and so it was laid up.</p> <p>19 Did you work on another boat on</p> <p>20 during that period?</p> <p>21 A. Yes, sir.</p> <p>22 Q. And other than that period of</p> <p>23 time, had there been any other occasions</p> <p>24 where you have been assigned to another tug</p> <p>25 besides the Mackenzie Rose?</p>

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<p style="text-align: right;">Page 14</p> <p>1 A. Yes.</p> <p>2 Q. Okay. And just -- I'm trying</p> <p>3 to understand this, you work on a day rate,</p> <p>4 correct?</p> <p>5 A. Yes, sir.</p> <p>6 Q. So everyday you don't work, you</p> <p>7 don't get paid, right?</p> <p>8 A. Yes.</p> <p>9 Q. You need to say yes or no.</p> <p>10 A. I'm sorry, yes.</p> <p>11 Q. She doesn't take down head nods</p> <p>12 that well either.</p> <p>13 A. Sorry.</p> <p>14 Q. No. That's okay.</p> <p>15 Have you ever been deposed</p> <p>16 before you have been to one of these?</p> <p>17 A. No, sir.</p> <p>18 Q. Okay. That's fine then.</p> <p>19 So it's to your advantage at</p> <p>20 least from a standpoint of income to work</p> <p>21 more days for the company, correct?</p> <p>22 A. Yes, sir.</p> <p>23 Q. So do you -- and they know</p> <p>24 that, they try to slot you into more days</p> <p>25 if there is the opportunity?</p>	<p style="text-align: right;">Page 16</p> <p>1 A. Yes, sir.</p> <p>2 Q. Have you ever used your</p> <p>3 personal cell phone to communicate about</p> <p>4 company business with anybody at Carver?</p> <p>5 A. No, sir.</p> <p>6 Q. What is your cell phone number?</p> <p>7 A. 89 --</p> <p>8 MR. RODGERS: I'm going to tell</p> <p>9 him not to answer that.</p> <p>10 MR. CHAPMAN: And there's a</p> <p>11 reason for that?</p> <p>12 MR. RODGERS: I'm telling him</p> <p>13 not to answer that.</p> <p>14 MR. CHAPMAN: You're</p> <p>15 instructing the witness not to answer</p> <p>16 that question?</p> <p>17 MR. RODGERS: Didn't I just say</p> <p>18 that?</p> <p>19 MR. CHAPMAN: Yeah, you did,</p> <p>20 but I'm just --</p> <p>21 MR. RODGERS: You can send a</p> <p>22 demand and we'll take it under</p> <p>23 advisement. I don't want him giving</p> <p>24 his personal phone number in this</p> <p>25 deposition. He's here in his</p>
<p style="text-align: right;">Page 15</p> <p>1 A. That's only if I ask.</p> <p>2 Q. Okay. So are you on or off now</p> <p>3 in one of your two or maybe now three-week</p> <p>4 cycles?</p> <p>5 A. I'll be starting today.</p> <p>6 Q. Okay. So today is the first</p> <p>7 day. Got it.</p> <p>8 Where are you meeting the tug?</p> <p>9 A. Staten Island.</p> <p>10 Q. Do you have a Carver Marine</p> <p>11 e-mail address?</p> <p>12 A. Like with Carver in it?</p> <p>13 Q. Yes.</p> <p>14 A. No, sir.</p> <p>15 Q. Okay. So what e-mail address</p> <p>16 do you typically use?</p> <p>17 A. Jarkeis@icloud.com.</p> <p>18 Q. So just your first name</p> <p>19 @icloud.com?</p> <p>20 A. Yes, sir.</p> <p>21 Q. Has the company issued you a</p> <p>22 phone? Has Carver issued you a phone?</p> <p>23 A. No, sir.</p> <p>24 Q. So do you take your personal</p> <p>25 cell phone when you are on the boat?</p>	<p style="text-align: right;">Page 17</p> <p>1 capacity as a Carver employee.</p> <p>2 Q. Have you held any other</p> <p>3 position at Carver other than as a deckhand</p> <p>4 assigned to a tug?</p> <p>5 A. No, sir.</p> <p>6 Q. When was the last time that you</p> <p>7 sailed with your father, James Morrisey, as</p> <p>8 an employee of Carver Marine?</p> <p>9 A. I don't know.</p> <p>10 Q. With reference to the date of</p> <p>11 the allision with the bridge, which was</p> <p>12 June 15th, 2024. I understand that the tug</p> <p>13 was on a voyage to deliver a barge in New</p> <p>14 Jersey.</p> <p>15 After that delivery, did the</p> <p>16 two of you sail together at all for Carver?</p> <p>17 A. No.</p> <p>18 Q. Do you know why?</p> <p>19 A. No.</p> <p>20 Q. So your father never told you</p> <p>21 why he was no longer working for Carver?</p> <p>22 A. No.</p> <p>23 Q. When did he go to work for</p> <p>24 Centerline?</p> <p>25 A. I don't know.</p>

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<p style="text-align: right;">Page 18</p> <p>1 Q. Was it in 2024 or 2025?</p> <p>2 A. I don't know.</p> <p>3 Q. Was it more than a month ago?</p> <p>4 A. I don't know.</p> <p>5 Q. Did he tell you that he was</p> <p>6 working for Centerline?</p> <p>7 A. Yes.</p> <p>8 Q. When did he first tell you</p> <p>9 that?</p> <p>10 A. I don't know.</p> <p>11 Q. What did you do to prepare to</p> <p>12 testify to today?</p> <p>13 MR. RODGERS: Other than with</p> <p>14 his attorney?</p> <p>15 MR. CHAPMAN: If there is</p> <p>16 anything else, yeah, but it could</p> <p>17 include meeting with an attorney.</p> <p>18 MR. RODGERS: You can state if</p> <p>19 you met with me but not what we</p> <p>20 discussed.</p> <p>21 A. Yes. I only met with him.</p> <p>22 That's all that I did today.</p> <p>23 Q. Okay, this morning?</p> <p>24 A. Yeah, this morning.</p> <p>25 Q. Any other time?</p>	<p style="text-align: right;">Page 20</p> <p>1 I was in Florida. I wasn't here.</p> <p>2 Q. You were off?</p> <p>3 A. Yes.</p> <p>4 Q. So you told us that this is the</p> <p>5 first time you've ever been in a</p> <p>6 deposition.</p> <p>7 Have you ever testified before?</p> <p>8 A. No, sir.</p> <p>9 Q. How did you first learn about</p> <p>10 the allision with the Norfolk & Portsmouth</p> <p>11 Belt Line Bridge?</p> <p>12 A. What do you mean by that?</p> <p>13 Q. Do you know what the term</p> <p>14 allision means?</p> <p>15 A. Yes.</p> <p>16 Q. Okay. It means a vessel</p> <p>17 hitting a fixed object, right?</p> <p>18 A. (Nodding.)</p> <p>19 Q. So my question is, how did you</p> <p>20 learn about that for the first time? What</p> <p>21 informed you of the fact that the</p> <p>22 vessel -- the tug, or barge had hit the</p> <p>23 Belt Line Bridge?</p> <p>24 A. We just came to a complete</p> <p>25 stop. That's all that I know.</p>
<p style="text-align: right;">Page 19</p> <p>1 A. No, sir.</p> <p>2 MR. RODGERS: You can</p> <p>3 talk -- tell him we met by Zoom, I</p> <p>4 believe, right? Yes.</p> <p>5 A. Yes.</p> <p>6 Q. Talking about --</p> <p>7 MR. RODGERS: So in person or?</p> <p>8 A. He said today, though.</p> <p>9 MR. RODGERS: Oh, you said</p> <p>10 today?</p> <p>11 MR. CHAPMAN: Yes.</p> <p>12 Q. My question was confusing.</p> <p>13 Thank you for sort of raising that.</p> <p>14 I'm trying to find out, was</p> <p>15 today the only time that you met with</p> <p>16 Mr. Rodgers?</p> <p>17 A. Yes, sir.</p> <p>18 Q. Okay. There was some reference</p> <p>19 that Mr. Rogers made, the meeting on Zoom?</p> <p>20 A. Yes.</p> <p>21 Q. And that was a separate meeting</p> <p>22 or was that also today?</p> <p>23 A. That was a separate meeting.</p> <p>24 Q. Okay. How long ago?</p> <p>25 A. Like, maybe a week ago because</p>	<p style="text-align: right;">Page 21</p> <p>1 Q. So what were you doing at the</p> <p>2 time that it happened?</p> <p>3 A. I was in the galley cooking and</p> <p>4 cleaning, and putting food away.</p> <p>5 Q. When was the meal served during</p> <p>6 your watch?</p> <p>7 A. Don't know.</p> <p>8 Q. So -- but you were still</p> <p>9 cooking?</p> <p>10 A. Yes.</p> <p>11 Q. And you were also cleaning. I</p> <p>12 assume you mean cleaning utensils or plates</p> <p>13 or that sort of thing; is that right?</p> <p>14 A. Yes, sir.</p> <p>15 Q. There's no dishwasher on that</p> <p>16 boat?</p> <p>17 A. No, sir.</p> <p>18 Q. And in terms of putting food</p> <p>19 away, what were you doing?</p> <p>20 A. Like putting in the</p> <p>21 refrigerator.</p> <p>22 Q. Okay. I'm just trying to</p> <p>23 understand what you mean by that.</p> <p>24 A. I know.</p> <p>25 Q. It's not like put it in the</p>

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<p>1 pantry or?</p> <p>2 A. No.</p> <p>3 Q. Okay.</p> <p>4 A. Like cover up tin foil or</p> <p>5 putting it in containers, then putting it</p> <p>6 in the refrigerator.</p> <p>7 Q. Now, the allision happened</p> <p>8 around 4:30 in the afternoon and the log</p> <p>9 record indicates that the vessel picked up</p> <p>10 the barge or departed with the barge around</p> <p>11 3 o'clock in the afternoon from a pier.</p> <p>12 Did you have any work in making</p> <p>13 up the barge or doing anything related to</p> <p>14 set it up to take it out of town?</p> <p>15 A. Yes, sir.</p> <p>16 Q. Tell us what you did?</p> <p>17 A. I helped put the push gear on</p> <p>18 and that was pretty much it.</p> <p>19 Q. Did anybody assist you putting</p> <p>20 the push gear on?</p> <p>21 A. I'm pretty sure.</p> <p>22 Q. Who?</p> <p>23 A. I don't know.</p> <p>24 Q. Who would've been on that</p> <p>25 watch?</p>	<p>1 seeing the logbook that it looks like</p> <p>2 you're on for six, off for six, on for six,</p> <p>3 off for six during the day, right?</p> <p>4 A. Yes.</p> <p>5 Q. And the watch that you were on</p> <p>6 was the noon to 6:00 p.m.?</p> <p>7 A. Yes, sir.</p> <p>8 Q. And then similarly from</p> <p>9 midnight to 6:00 a.m., correct?</p> <p>10 A. Yes, sir.</p> <p>11 Q. Would the engineer normally</p> <p>12 assist in making up the pushing gear?</p> <p>13 A. Yes.</p> <p>14 Q. So does it refresh your</p> <p>15 recollection that Jason, the engineer</p> <p>16 assisted in setting up the push gear?</p> <p>17 A. Probably.</p> <p>18 MR. RODGERS: Don't -- by the</p> <p>19 way, don't guess if you don't know.</p> <p>20 A. I don't know.</p> <p>21 Q. How -- while you were -- after</p> <p>22 you arrived at the pier, the logbook</p> <p>23 indicates that somebody showed up as a</p> <p>24 surveyor to look at the way the cargo was</p> <p>25 lashed on the barge. Do you remember that?</p>
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<p>1 A. I was on back watch, so it was</p> <p>2 the mate.</p> <p>3 Q. All right, so the --</p> <p>4 A. The mate Jimmy.</p> <p>5 Q. You refer to him as Jimmy, your</p> <p>6 father?</p> <p>7 A. (Nodding.)</p> <p>8 Q. But -- yes?</p> <p>9 A. Yes.</p> <p>10 Q. Okay, you made a hand</p> <p>11 signaling?</p> <p>12 A. That's three times you said</p> <p>13 father.</p> <p>14 Q. Yeah.</p> <p>15 A. I was just -- yes.</p> <p>16 MR. RODGERS: You can just tell</p> <p>17 him what you call him on the tug.</p> <p>18 A. I just call him Jimmy, or</p> <p>19 captain or mate.</p> <p>20 Q. Okay. All right. Was anybody</p> <p>21 else on watch during that cycle?</p> <p>22 A. Jason.</p> <p>23 Q. Jason was?</p> <p>24 A. The engineer.</p> <p>25 Q. Okay. So I understand from</p>	<p>1 A. I do not.</p> <p>2 MR. RODGERS: Objection to</p> <p>3 form.</p> <p>4 You can answer.</p> <p>5 A. I do not.</p> <p>6 Q. Did you go ashore for any</p> <p>7 reason before getting underway with the</p> <p>8 barge?</p> <p>9 A. What do you mean by that?</p> <p>10 Q. You know, go call an Uber and</p> <p>11 go and to get something to eat, or call an</p> <p>12 Uber to go pick up groceries, go ashore?</p> <p>13 A. No. No.</p> <p>14 Q. Okay. Was there anybody from</p> <p>15 the company where you were picking up the</p> <p>16 barge that you knew of that met you at the</p> <p>17 pier?</p> <p>18 A. No.</p> <p>19 Q. So you said that you were in</p> <p>20 the galley when the tug came to a stop,</p> <p>21 that's what you've noticed. Did it knock</p> <p>22 you off your feet?</p> <p>23 A. No, sir.</p> <p>24 Q. Cause you to, you know, lose</p> <p>25 your balance in any way?</p>

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<p>1 A. Just a little bit.</p> <p>2 Q. What did you do after you felt</p> <p>3 that the tug come to a stop?</p> <p>4 A. I went up to the wheelhouse to</p> <p>5 make sure everything was okay, and make</p> <p>6 sure the captain or the mate was okay.</p> <p>7 Q. So which wheelhouse did you go</p> <p>8 to?</p> <p>9 A. The upper wheelhouse.</p> <p>10 Q. And that's where the mate was?</p> <p>11 A. Yes, sir.</p> <p>12 Q. What did he tell you about what</p> <p>13 had happened?</p> <p>14 A. He said he lost steering.</p> <p>15 Q. What did you understand the</p> <p>16 explanation he gave you to mean?</p> <p>17 MR. RODGERS: Objection to</p> <p>18 form. You can answer if you</p> <p>19 understand it.</p> <p>20 A. That he lost steering.</p> <p>21 Q. What does that mean to you</p> <p>22 though?</p> <p>23 MR. RODGERS: Objection to</p> <p>24 form. You can answer if you</p> <p>25 understand the question.</p>	<p>1 A. Like a minute.</p> <p>2 Q. Did he instruct you to go do</p> <p>3 anything on account of having lost</p> <p>4 steering?</p> <p>5 A. No.</p> <p>6 Q. So he told you that he lost</p> <p>7 steering and then you left?</p> <p>8 A. I went to the other wheelhouse</p> <p>9 and then that's when Chris Miller said, "Go</p> <p>10 check the barge out to see if there was any</p> <p>11 damage."</p> <p>12 Q. So when you came up into the</p> <p>13 upper wheelhouse, what was the position of</p> <p>14 the -- a barge, or tug, however you think</p> <p>15 of it, relative to the bridge?</p> <p>16 Where were you?</p> <p>17 A. I don't know.</p> <p>18 Q. Could you have -- did you have</p> <p>19 an unobstructed view out of the front of</p> <p>20 the wheelhouse.</p> <p>21 MR. RODGERS: Objection to</p> <p>22 form. You can answer if you</p> <p>23 understand.</p> <p>24 A. I don't know.</p> <p>25 Q. You don't know?</p>
Page 27	Page 29
<p>1 A. I don't know.</p> <p>2 Q. So he told you that he lost</p> <p>3 steering. Did you make any further inquiry</p> <p>4 about what he meant by losing steering?</p> <p>5 A. No, sir.</p> <p>6 Q. Did he tell you to go tell the</p> <p>7 engineer there was a problem with the</p> <p>8 steering?</p> <p>9 A. No, sir.</p> <p>10 Q. Did the engineer come in there</p> <p>11 while the two of you were in the</p> <p>12 wheelhouse?</p> <p>13 MR. RODGERS: Objection to</p> <p>14 form.</p> <p>15 You can answer if you</p> <p>16 understand the question.</p> <p>17 A. No, sir.</p> <p>18 Q. Okay. So when you went up</p> <p>19 there to find out what had happened, it was</p> <p>20 just the two of you in the upper</p> <p>21 wheelhouse, correct?</p> <p>22 A. Yes.</p> <p>23 Q. And about how long were you in</p> <p>24 there when he was telling you that he had</p> <p>25 lost steering?</p>	<p>1 A. I don't know.</p> <p>2 Q. Did you look out the front of</p> <p>3 the wheelhouse while you were up there?</p> <p>4 A. No.</p> <p>5 Q. So you had no instructions from</p> <p>6 the mate, and then you went down to the,</p> <p>7 I'll call it the wheelhouse, but it's the</p> <p>8 wheelhouse right below the upper</p> <p>9 wheelhouse, right?</p> <p>10 A. Lower wheelhouse.</p> <p>11 Q. Okay. So we'll call it the</p> <p>12 lower wheelhouse then. There's two</p> <p>13 wheelhouses on that tug, right?</p> <p>14 A. Yes, sir.</p> <p>15 Q. Upper and lower?</p> <p>16 A. (Nodding.)</p> <p>17 Q. So what was the purpose of</p> <p>18 going to the lower wheelhouse?</p> <p>19 MR. RODGERS: Objection. His</p> <p>20 purpose?</p> <p>21 MR. CHAPMAN: Yeah. He said he</p> <p>22 went there.</p> <p>23 A. My purpose was to go back down</p> <p>24 and make sure everything -- everybody else</p> <p>25 was okay. That's when I saw Chris Miller.</p>

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<p style="text-align: right;">Page 30</p> <p>1 He said, "Go see if you could see</p> <p>2 underneath the rake.</p> <p>3 Q. Got it. So you need to go</p> <p>4 through the lower wheelhouse in order to go</p> <p>5 check on the rest of the crew; is that</p> <p>6 right?</p> <p>7 A. Yes.</p> <p>8 Q. Okay. And when you were in the</p> <p>9 lower wheelhouse, did -- was Captain Miller</p> <p>10 already there?</p> <p>11 A. Yes.</p> <p>12 Q. And what did he appear to be</p> <p>13 doing to you?</p> <p>14 A. I don't know.</p> <p>15 Q. Did you speak to him first or</p> <p>16 did he say something to you first?</p> <p>17 A. He said something to me first.</p> <p>18 Q. And what was that?</p> <p>19 A. He said, "Go check the barge</p> <p>20 and see if there are any damage to the</p> <p>21 barge."</p> <p>22 Q. So did he tell you what part of</p> <p>23 the barge to go look at?</p> <p>24 A. The bowl of the barge.</p> <p>25 Q. So the tug and the barge we're</p>	<p style="text-align: right;">Page 32</p> <p>1 A. Yes, sir.</p> <p>2 Q. Before you decided that you</p> <p>3 really couldn't see very well?</p> <p>4 A. Yes.</p> <p>5 Q. Okay. Based on what you could</p> <p>6 see at the far head of the barge, did you</p> <p>7 observe any, I'll call it damage, or</p> <p>8 anything that was amiss?</p> <p>9 A. No, sir.</p> <p>10 Q. Did you take a handheld radio</p> <p>11 with you?</p> <p>12 A. Yes.</p> <p>13 Q. And did you use the handheld</p> <p>14 radio to communicate with anybody on the</p> <p>15 tug?</p> <p>16 A. Yes.</p> <p>17 Q. Who?</p> <p>18 A. Chris and Jimmy.</p> <p>19 Q. So you all were on the same</p> <p>20 channel?</p> <p>21 A. Yes.</p> <p>22 Q. Do you recall the channel?</p> <p>23 A. 81.</p> <p>24 Q. And what did you tell them?</p> <p>25 A. That I can't see nothing.</p>
<p style="text-align: right;">Page 31</p> <p>1 still made up in pushing gear, correct?</p> <p>2 A. (Nodding.)</p> <p>3 Q. You need to say yes or no.</p> <p>4 A. Yes.</p> <p>5 Q. So did you go up to -- do you</p> <p>6 then get on the barge and walk up to, I'll</p> <p>7 call it the head end of the barge?</p> <p>8 A. Yes.</p> <p>9 Q. Did you take any camera with</p> <p>10 you?</p> <p>11 A. I had the boat phone, but I</p> <p>12 couldn't see underneath the rake, so I</p> <p>13 didn't take nothing.</p> <p>14 Q. Did you look over the rake or</p> <p>15 look at the forward end of the barge?</p> <p>16 A. I couldn't. I would have fell.</p> <p>17 Q. I'm sorry. You would what?</p> <p>18 A. I would have fallen if I did.</p> <p>19 Q. So you couldn't kind of lean</p> <p>20 out over and have a look at it. But you</p> <p>21 were at the forward end of the barge?</p> <p>22 A. Yes, sir.</p> <p>23 Q. And did you sort of get out</p> <p>24 about as far as you felt comfortable</p> <p>25 getting out?</p>	<p style="text-align: right;">Page 33</p> <p>1 Q. So what'd you do after that?</p> <p>2 A. I went back to the galley.</p> <p>3 Q. Did they say, "Yeah, that's</p> <p>4 fine," or you just said, "I can't see</p> <p>5 nothing" and you just went back to the</p> <p>6 galley?</p> <p>7 A. Yeah. They said, "That's fine,</p> <p>8 just head back to the boat." So I did.</p> <p>9 Q. Okay. While you were on the</p> <p>10 head end of the barge, where was the tug</p> <p>11 and barge located?</p> <p>12 A. Past the bridge.</p> <p>13 Q. Had you already gone past the</p> <p>14 bridge?</p> <p>15 A. (Nodding.)</p> <p>16 Q. Yes?</p> <p>17 A. No.</p> <p>18 MR. RODGERS: You got to</p> <p>19 answer, yes.</p> <p>20 A. No. We was about to go like,</p> <p>21 underneath the bridge at that point when I</p> <p>22 went to go check the barge.</p> <p>23 Q. All right. So the tug and</p> <p>24 barge had still not gone through the bridge</p> <p>25 or through the bridge opening, when you</p>

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<p style="text-align: right;">Page 34</p> <p>1 went and looked at the head end of the</p> <p>2 barge?</p> <p>3 A. Yes.</p> <p>4 Q. Okay. Was the tug and barge</p> <p>5 moving at the time that you went up to the</p> <p>6 head end or you just stopped in the water?</p> <p>7 A. It was moving.</p> <p>8 Q. In what direction?</p> <p>9 A. Going up further, or -- I don't</p> <p>10 know what direction that is.</p> <p>11 Q. So you were proceeding</p> <p>12 basically in the direction to go through</p> <p>13 the bridge opening?</p> <p>14 A. Yes.</p> <p>15 Q. Did you look at the bridge from</p> <p>16 your vantage point?</p> <p>17 A. No.</p> <p>18 Q. You -- nobody asked you to look</p> <p>19 at the bridge?</p> <p>20 A. No.</p> <p>21 Q. And you didn't think that you</p> <p>22 should look at the bridge?</p> <p>23 MR. RODGERS: Objection to</p> <p>24 form.</p> <p>25 You can answer if you</p>	<p style="text-align: right;">Page 36</p> <p>1 power -- the rudders.</p> <p>2 A. It was the mate.</p> <p>3 Q. Okay, from the upper</p> <p>4 wheelhouse. Okay. So --</p> <p>5 THE REPORTER: Just say yes or</p> <p>6 no.</p> <p>7 A. Yes.</p> <p>8 Q. So to your understanding,</p> <p>9 Captain Miller was not doing anything to</p> <p>10 operate the vessel, even though he was in</p> <p>11 the lower wheelhouse, right?</p> <p>12 A. Yes.</p> <p>13 Q. Okay. At any time before you</p> <p>14 went back to the galley, did you see the</p> <p>15 engineer?</p> <p>16 A. Yes.</p> <p>17 Q. Where did you see him?</p> <p>18 A. In the galley.</p> <p>19 Q. So you didn't see the engineer</p> <p>20 in the lower wheelhouse, correct?</p> <p>21 A. No.</p> <p>22 Q. I think you've already said</p> <p>23 that you didn't see him in the upper</p> <p>24 wheelhouse, right?</p> <p>25 A. Yes.</p>
<p style="text-align: right;">Page 35</p> <p>1 understand the question.</p> <p>2 A. No.</p> <p>3 Q. Were you still on the barge</p> <p>4 when the tug and barge made the transit</p> <p>5 through the bridge opening?</p> <p>6 A. No.</p> <p>7 Q. You'd already gone back to the</p> <p>8 tug before that happened?</p> <p>9 A. Yes.</p> <p>10 Q. And once you get back -- got</p> <p>11 back on the tug, what did you do?</p> <p>12 A. I went to the galley and</p> <p>13 finished cleaning up.</p> <p>14 Q. When you came back aboard the</p> <p>15 tug, was Captain Miller still in the lower</p> <p>16 wheelhouse?</p> <p>17 A. Yes.</p> <p>18 Q. And was the mate, Jimmy</p> <p>19 Morrisey, in the upper wheelhouse?</p> <p>20 A. Yes.</p> <p>21 Q. Do you know who was, you know,</p> <p>22 at the con of the boat at that time?</p> <p>23 A. What you mean by that?</p> <p>24 Q. Well, I'm trying to understand</p> <p>25 who is still, you know, handling the</p>	<p style="text-align: right;">Page 37</p> <p>1 Q. Did you -- before going back to</p> <p>2 the galley, did you ever go back up to the</p> <p>3 upper wheelhouse?</p> <p>4 A. No.</p> <p>5 Q. Did you inspect the pushing</p> <p>6 gear at all while you were out there, you</p> <p>7 know, looking at the front end of the</p> <p>8 barge?</p> <p>9 A. What do you mean by that?</p> <p>10 Q. Just to see if it was still</p> <p>11 secure?</p> <p>12 A. Yes.</p> <p>13 Q. So you did check the pushing</p> <p>14 gear, correct?</p> <p>15 A. Yes.</p> <p>16 Q. And how did it appear to you?</p> <p>17 A. It looked fine while looking at</p> <p>18 it.</p> <p>19 Q. Were you asked to look at any</p> <p>20 possible damage to the tug itself?</p> <p>21 A. No.</p> <p>22 Q. Only to the head end of the</p> <p>23 barge?</p> <p>24 A. Yes.</p> <p>25 Q. Eventually the tug put the</p>

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<p style="text-align: right;">Page 38</p> <p>1 barge on a tow wire for the transit up the 2 Chesapeake Bay, correct? 3 A. Yes. 4 Q. Did you have any role in 5 putting the tug on the tow wire? Excuse 6 me, putting the barge on the tow wire? 7 A. Everyone had to be up when we 8 do tub. 9 Q. So whether it was your watch or 10 not, you would have been involved? 11 A. Yes. 12 Q. Do you recall that? 13 A. Yes. 14 Q. When you were involved in 15 putting the barge on the tow wire, did you 16 do any further examination or look at the 17 barge to see if there was damage? 18 A. No. 19 Q. While you were up on the head 20 end of the barge when Captain Miller told 21 you to go up and check it out, did you take 22 any photographs with the boat phone? 23 A. No. 24 Q. I just got to ask this, but did 25 you take any photographs with your own</p>	<p style="text-align: right;">Page 40</p> <p>1 A. No. 2 Q. Did you ever see any pictures 3 of the bridge? That is the Belt Line 4 Bridge? 5 A. No. 6 Q. Did anyone tell you that they 7 had taken a picture of the Belt Line 8 bridge? 9 A. No. 10 Q. Did anybody tell you they had 11 taken pictures of the barge? 12 A. No. 13 Q. Between June 15th, and the time 14 that you first met with Mr. Rodgers, did 15 you ever see any pictures that had been 16 taken of the Belt Line Bridge? 17 A. No. 18 Q. Did you ever see any pictures 19 that had been taken of the head end of the 20 barge? 21 A. No. 22 Q. Was the voyage to where you 23 were delivering the barge in New Jersey, 24 uneventful? 25 A. I don't know.</p>
<p style="text-align: right;">Page 39</p> <p>1 personal phone? 2 A. No. 3 Q. When the barge was being set up 4 on the tow wire did you take any 5 photographs of the head end of the barge? 6 A. I did not. 7 Q. Did you see anybody take 8 photographs? 9 A. Someone did, but I don't 10 know -- I don't remember who. 11 Q. Why do you know someone did? 12 A. Because they slowly drove 13 around the barge to see if there was any 14 damage up front. 15 Q. And you were on the deck of the 16 tug at the time? 17 A. Yes, sir. 18 Q. So you're assuming somebody 19 took some pictures, but -- 20 A. I don't know, honestly. 21 Q. But you don't know -- 22 A. Yeah. 23 Q. -- right. 24 I mean, did you ever see any 25 pictures of the head end of the barge?</p>	<p style="text-align: right;">Page 41</p> <p>1 Q. You just don't have any memory 2 of that? 3 A. I was off watch. 4 Q. If the voyage took two days, 5 you would've been on watch at some point 6 during the voyage, right? 7 A. Yes. 8 Q. What I'm asking you is whether 9 the rest of the voyage with that barge, at 10 least when you were on watch was 11 uneventful? 12 A. Why would it be uneventful? 13 MR. RODGERS: You don't 14 understand the question? 15 A. I don't understand the 16 question. 17 Q. There wasn't anything else that 18 happened -- 19 A. Yeah, no. 20 Q. -- during that voyage, after 21 you departed the bridge, the Belt Line 22 Bridge -- 23 A. No. 24 Q. -- right? 25 A. Nothing happened, to my</p>

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<p style="text-align: right;">Page 42</p> <p>1 knowledge.</p> <p>2 Q. Subsequent to arriving in a</p> <p>3 destination, were you ever interviewed by</p> <p>4 anybody?</p> <p>5 A. Please repeat that again.</p> <p>6 Q. Let me step back.</p> <p>7 At any point in -- at any time</p> <p>8 after this incident involving the Belt Line</p> <p>9 Bridge, were you asked to make a statement?</p> <p>10 A. Yes.</p> <p>11 Q. And who asked you to make a</p> <p>12 statement?</p> <p>13 A. Chris Miller. He said, "Write</p> <p>14 a statement on a piece of paper."</p> <p>15 Q. And did he tell you to do that</p> <p>16 that day?</p> <p>17 A. Yes.</p> <p>18 Q. Like sometime in the hours or</p> <p>19 so after the incident?</p> <p>20 A. Yes.</p> <p>21 Q. So you wrote down in your own</p> <p>22 handwriting, a statement, correct?</p> <p>23 A. Yes, sir.</p> <p>24 Q. Did he watch you do it?</p> <p>25 A. No.</p>	<p style="text-align: right;">Page 44</p> <p>1 statement to Captain Miller?</p> <p>2 A. Yes.</p> <p>3 Q. Did you make a copy of it for</p> <p>4 yourself?</p> <p>5 A. No.</p> <p>6 Q. Have you seen that statement</p> <p>7 since you first made it?</p> <p>8 A. Yes.</p> <p>9 MR. RODGERS: Other than with</p> <p>10 his lawyers.</p> <p>11 A. Yeah. That's the only time I</p> <p>12 saw it, with my lawyer. But other than</p> <p>13 that --</p> <p>14 MR. RODGERS: That's enough.</p> <p>15 Q. Okay. Did -- were you also</p> <p>16 asked to type up a statement?</p> <p>17 A. No.</p> <p>18 Q. Even if you weren't asked to</p> <p>19 type up a statement, did you?</p> <p>20 A. No.</p> <p>21 Q. You only hand wrote a</p> <p>22 statement?</p> <p>23 A. Yes.</p> <p>24 Q. Do you know if anybody ever</p> <p>25 typed up a statement for you?</p>
<p style="text-align: right;">Page 43</p> <p>1 Q. Do you know if anybody else was</p> <p>2 asked to make a statement?</p> <p>3 A. The whole crew that was on the</p> <p>4 boat was asked to make -- write a</p> <p>5 statement.</p> <p>6 Q. And was there a pad of paper</p> <p>7 provided to write the statement on?</p> <p>8 A. Yes.</p> <p>9 Q. By Captain Miller?</p> <p>10 A. Yes.</p> <p>11 Q. But he didn't watch you write</p> <p>12 your statement or tell you what to write,</p> <p>13 correct?</p> <p>14 A. Yes.</p> <p>15 Q. I'm sorry, he did?</p> <p>16 A. No. He didn't watch us. He</p> <p>17 did not tell us what to write on a</p> <p>18 statement. So you asked two questions</p> <p>19 there instead of one.</p> <p>20 Q. So you wrote down in your</p> <p>21 statement, in your own words, what you had</p> <p>22 experienced or what you recalled about,</p> <p>23 right?</p> <p>24 A. Yes.</p> <p>25 Q. Okay. Did you give that</p>	<p style="text-align: right;">Page 45</p> <p>1 A. I don't know.</p> <p>2 Q. Just to be clear on this. No</p> <p>3 one told you that they were going to write</p> <p>4 up a statement -- to type up a statement</p> <p>5 for you, correct?</p> <p>6 A. Yes.</p> <p>7 Q. And did anybody every type up a</p> <p>8 statement and put it in front of you and</p> <p>9 tell you to sign it?</p> <p>10 A. I don't know.</p> <p>11 Q. And you don't know because you</p> <p>12 just don't remember or?</p> <p>13 A. I just generally don't know.</p> <p>14 Q. Okay. Have you seen a ever</p> <p>15 statement that was typed?</p> <p>16 MR. RODGERS: Other than with</p> <p>17 his lawyer, right?</p> <p>18 Q. That has your signature on it?</p> <p>19 A. Yes, only with my lawyer.</p> <p>20 Q. Okay. After arriving with the</p> <p>21 barge in New Jersey, did anybody to come to</p> <p>22 the boat, or ask you to come in to be</p> <p>23 interviewed about what you had experienced?</p> <p>24 A. No.</p> <p>25 Q. Do you know who Leonard</p>

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<p style="text-align: right;">Page 46</p> <p>1 Baldassare is?</p> <p>2 A. Yes.</p> <p>3 Q. Sometimes called Lenny?</p> <p>4 A. That I call Lenny?</p> <p>5 Q. Well, other be people maybe.</p> <p>6 Do you know who Mr. Baldassare is?</p> <p>7 A. Yes, I know him. He used to</p> <p>8 work for Carver.</p> <p>9 Q. He was previously the port</p> <p>10 captain for Carver, right?</p> <p>11 A. Yes.</p> <p>12 Q. Did he ever interview you</p> <p>13 about --</p> <p>14 A. No.</p> <p>15 Q. -- the incident in Belt Line</p> <p>16 Bridge?</p> <p>17 A. No.</p> <p>18 Q. Did the Coast Guard ever</p> <p>19 interview you about it?</p> <p>20 A. When we all was on a meeting on</p> <p>21 it before, but no.</p> <p>22 Q. I'm sorry, you were all on</p> <p>23 what?</p> <p>24 A. I was on a Zoom meeting with</p> <p>25 bridge and Carver and he was there too, so.</p>	<p style="text-align: right;">Page 48</p> <p>1 talked to?</p> <p>2 A. No.</p> <p>3 Q. Do you know how long they were</p> <p>4 aboard?</p> <p>5 A. No.</p> <p>6 Q. Do you know why they were</p> <p>7 aboard?</p> <p>8 A. For the bridge incident.</p> <p>9 Q. Okay. So Mr. Baldassare never</p> <p>10 talked to you about the incident, correct?</p> <p>11 A. Right.</p> <p>12 Q. Do you know who Brian Moore is?</p> <p>13 A. Yes, sir.</p> <p>14 Q. Did Brian Moore ever talk to</p> <p>15 you about the incident?</p> <p>16 A. No, sir.</p> <p>17 Q. Did -- besides those two guys,</p> <p>18 was there anybody else on behalf of Carver,</p> <p>19 an employee of Carver that spoke to you</p> <p>20 about the incident after you had delivered</p> <p>21 the barge?</p> <p>22 A. No.</p> <p>23 Q. Do you know what a Coast Guard</p> <p>24 Form 2692 is?</p> <p>25 A. Probably.</p>
<p style="text-align: right;">Page 47</p> <p>1 Q. Okay.</p> <p>2 MR. RODGERS: So wait a minute.</p> <p>3 What?</p> <p>4 A. At the beginning of it, they</p> <p>5 all had a Zoom meeting.</p> <p>6 Q. He's talking about the Coast</p> <p>7 Guard investigation.</p> <p>8 MR. RODGERS: I was there.</p> <p>9 Okay.</p> <p>10 A. Yeah.</p> <p>11 MR. RODGERS: I thought you</p> <p>12 were talking about on Staten Island.</p> <p>13 A. No. No. No.</p> <p>14 Q. I'm just trying to understand.</p> <p>15 Did the Coast Guard ever come a board the</p> <p>16 boat while you were on it to interview you</p> <p>17 or anybody else in the crew about the</p> <p>18 incident?</p> <p>19 A. Well, they came on the boat,</p> <p>20 but they didn't interview us.</p> <p>21 Q. So there was some day after the</p> <p>22 incident where the Coast Guard arrived and</p> <p>23 they obviously didn't talk to you, right?</p> <p>24 A. Yes.</p> <p>25 Q. Do you know who else they</p>	<p style="text-align: right;">Page 49</p> <p>1 MR. RODGERS: Well, don't</p> <p>2 guess.</p> <p>3 Q. You don't have to guess. I'm</p> <p>4 just ask if you know.</p> <p>5 A. Do you have a form?</p> <p>6 If I see one, I might -- could</p> <p>7 say yes or no to it.</p> <p>8 Q. Okay. Let me show you Exhibit</p> <p>9 19. That is a Coast Guard Form 2692.</p> <p>10 You see the little report in</p> <p>11 the form number in the lower left-hand</p> <p>12 corner, CG-2692.</p> <p>13 Do you see that?</p> <p>14 A. Yeah.</p> <p>15 Q. And I'm just asking if you know</p> <p>16 what that is.</p> <p>17 A. No.</p> <p>18 Q. Okay. And just to be clear,</p> <p>19 you've never seen what is marked as Exhibit</p> <p>20 19?</p> <p>21 A. No.</p> <p>22 Q. Before now?</p> <p>23 A. No.</p> <p>24 Q. Okay. So Carver Marine</p> <p>25 produced some documents that relate to you</p>

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<p style="text-align: right;">Page 50</p> <p>1 that I just want you to take a look at and</p> <p>2 confirm that they are correct.</p> <p>3 I'm going to pass you Exhibit</p> <p>4 10, which I believe is a photocopy of your</p> <p>5 merchant mariners document?</p> <p>6 A. Yes.</p> <p>7 Q. Is that the one that you're</p> <p>8 currently under or did you now -- renewal</p> <p>9 that you're now using?</p> <p>10 A. I have a renewal that I'm using</p> <p>11 now.</p> <p>12 Q. That would've been in effect</p> <p>13 back in June of 2024?</p> <p>14 A. Yes, sir.</p> <p>15 Q. Okay. And there's also</p> <p>16 attached at the back, a pre-employment drug</p> <p>17 screen, that I presume was required before</p> <p>18 you were hired. It says that it was done</p> <p>19 near the end of April of 2024?</p> <p>20 A. Yes.</p> <p>21 Q. Is that your memory about when</p> <p>22 you started?</p> <p>23 A. Yes.</p> <p>24 Q. I think you said that you'd</p> <p>25 worked for them for a year now, right?</p>	<p style="text-align: right;">Page 52</p> <p>1 involving the Belt Line Bridge and it</p> <p>2 appears to have your signature on it.</p> <p>3 Is that your signature on it?</p> <p>4 A. Yes.</p> <p>5 Q. It is.</p> <p>6 Do you have any memory of</p> <p>7 signing that?</p> <p>8 A. No, sir.</p> <p>9 Q. Do you know how it came to be</p> <p>10 in creation in the first place?</p> <p>11 A. No, sir.</p> <p>12 Q. It's dated or maybe it's not</p> <p>13 dated, but it's relative to the incident on</p> <p>14 June 15th. But you had nothing to do with</p> <p>15 preparing that statement other than</p> <p>16 your -- apparently your signature is on it;</p> <p>17 is that right?</p> <p>18 A. Yes.</p> <p>19 Q. Okay. Now if you could turn to</p> <p>20 the second page in that Exhibit Number 11.</p> <p>21 It's also typed up.</p> <p>22 Do you see that?</p> <p>23 A. (Nodding.)</p> <p>24 Q. And I want to ask you, did you</p> <p>25 prepare that typed up statement?</p>
<p style="text-align: right;">Page 51</p> <p>1 A. Yes.</p> <p>2 Q. Okay. And then the other</p> <p>3 exhibit I want to show you is marked as</p> <p>4 Number 11. It consists of three pages, but</p> <p>5 I just want to focus on the first page for</p> <p>6 a second.</p> <p>7 Is that a copy of the statement</p> <p>8 that you made when Captain Miller told you</p> <p>9 to write up a statement about what</p> <p>10 you -- what had happened?</p> <p>11 MR. RODGERS: Read it first, so</p> <p>12 you --</p> <p>13 A. We left after --</p> <p>14 MR. RODGERS: No. Don't read</p> <p>15 it out loud. Just make sure</p> <p>16 it's -- you recognize it, so read it</p> <p>17 to yourself, just...</p> <p>18 A. Yes.</p> <p>19 Q. That's a photocopy of it,</p> <p>20 correct?</p> <p>21 A. Yes.</p> <p>22 Q. All right. Great. There's two</p> <p>23 more pages. If you can turn to the last</p> <p>24 page of Exhibit 11. It's a typed up form</p> <p>25 of the statement about the incident</p>	<p style="text-align: right;">Page 53</p> <p>1 A. I didn't type nothing.</p> <p>2 Q. Okay. Do you know who typed up</p> <p>3 that statement?</p> <p>4 A. No, sir.</p> <p>5 Q. Have you ever seen it?</p> <p>6 MR. RODGERS: Other than with</p> <p>7 your lawyer.</p> <p>8 A. Yeah, only with my lawyer, but</p> <p>9 no.</p> <p>10 Q. Okay. So sometime in maybe the</p> <p>11 last week or so is the first time you saw</p> <p>12 it?</p> <p>13 A. Yes, sir.</p> <p>14 Q. Okay. All right. Now, I know</p> <p>15 you told us that you hadn't seen a photo of</p> <p>16 the bridge or photos of the bridge and you</p> <p>17 hadn't seen photos of the barge, but I just</p> <p>18 want to confirm because there's a couple of</p> <p>19 them that have been marked already as</p> <p>20 exhibits.</p> <p>21 So I'm going to pass you</p> <p>22 Exhibit 1. I apologize for the kind of</p> <p>23 graininess, but that's the way it was</p> <p>24 produced to us by Carver.</p> <p>25 I'll present to you that I</p>

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<p style="text-align: right;">Page 54</p> <p>1 believe that is a picture of the Belt Line</p> <p>2 Bridge, taken on June 15th, 2024?</p> <p>3 Have you ever seen it before?</p> <p>4 A. No, sir.</p> <p>5 Q. Okay. And then if I could pass</p> <p>6 you Exhibit 2 which are four photographs</p> <p>7 that were produced to us by Carver.</p> <p>8 That -- again, I apologize for the</p> <p>9 graininess, but that's the way we got them.</p> <p>10 Appear to depict the head of</p> <p>11 the barge which may or may not be the Weeks</p> <p>12 281, which you were towing that day.</p> <p>13 But just to confirm, have you</p> <p>14 ever seen those photographs before?</p> <p>15 A. No sir.</p> <p>16 Q. Did you ever have the vantage</p> <p>17 point on the Tug Mackenzie Rose on June</p> <p>18 15th, 2024, to see what is shown in those</p> <p>19 photos?</p> <p>20 A. What do you mean by that?</p> <p>21 Q. I'm just asking if you could</p> <p>22 have seen that same view of those photos of</p> <p>23 the barge while you a board the tug</p> <p>24 Mackenzie Rose on June 15th, 2024?</p> <p>25 A. No.</p>	<p style="text-align: right;">Page 56</p> <p>1 Do you know what it's called?</p> <p>2 A. Yes.</p> <p>3 Q. That's --</p> <p>4 A. It's Helm.</p> <p>5 Q. Okay. Do you ever make entries</p> <p>6 in Helm?</p> <p>7 A. No, sir.</p> <p>8 Q. Do you have access to Helm?</p> <p>9 A. No, sir.</p> <p>10 Q. Do you know whether Carver has</p> <p>11 a safety management system, like an</p> <p>12 electronic safety management system?</p> <p>13 A. I don't know.</p> <p>14 Q. Is there any -- well, do you</p> <p>15 have access to any electronic records on</p> <p>16 the boat?</p> <p>17 A. No.</p> <p>18 Q. Is there some ability of others</p> <p>19 on the boat to acces electronic records?</p> <p>20 A. Yes.</p> <p>21 Q. Where is that access located?</p> <p>22 So like a laptop somewhere or?</p> <p>23 A. In the wheelhouse, lower</p> <p>24 wheelhouse.</p> <p>25 Q. Okay. And do you ever us the</p>
<p style="text-align: right;">Page 55</p> <p>1 Q. You could not have?</p> <p>2 A. I -- no.</p> <p>3 Q. Okay.</p> <p>4 MR. CHAPMAN: Thank you.</p> <p>5 Q. This was marked as Exhibit 5</p> <p>6 previously. I believe it is the crew list</p> <p>7 for that particular voyage on June 15th.</p> <p>8 Does that conform to the people</p> <p>9 that you remember being -- serving in the</p> <p>10 crew?</p> <p>11 A. Yeah.</p> <p>12 Q. On June 15th, 2024?</p> <p>13 A. Yes.</p> <p>14 Q. Okay. Are you familiar with,</p> <p>15 I'll call it a system, I don't really know</p> <p>16 what it's -- what it completely does that</p> <p>17 allows for electronic log entries used by</p> <p>18 Carver?</p> <p>19 A. Yes.</p> <p>20 MR. RODGERS: Are you asking if</p> <p>21 he's familiar with it?</p> <p>22 MR. CHAPMAN: Mm-hmm, yep.</p> <p>23 A. Yes.</p> <p>24 Q. I believe it's called Helm or</p> <p>25 that it's referred to as Helm.</p>	<p style="text-align: right;">Page 57</p> <p>1 laptop in the lower wheelhouse?</p> <p>2 A. No, sir.</p> <p>3 Q. So I want to pass over to you</p> <p>4 now what was marked as Exhibit 4, which is</p> <p>5 a collection of documents that were</p> <p>6 produced to us by Carver. They have a</p> <p>7 bunch of section numbers and titles on</p> <p>8 them. And just take a look at the first</p> <p>9 page, if you would underneath the cover.</p> <p>10 It says, "5.1."</p> <p>11 And can you read the title</p> <p>12 there?</p> <p>13 A. "Master Responsibility and</p> <p>14 Authority."</p> <p>15 Q. Okay. And if you go down</p> <p>16 to -- it's the next session, I think 6.12.</p> <p>17 It's probably another couple three pages</p> <p>18 down.</p> <p>19 A. Deckhands?</p> <p>20 Q. Yeah. There's a section on</p> <p>21 deckhands.</p> <p>22 Have you ever seen that before?</p> <p>23 A. Yes.</p> <p>24 Q. Okay. When was the first time</p> <p>25 you saw it?</p>

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<p style="text-align: right;">Page 58</p> <p>1 A. When I got on a boat.</p> <p>2 Q. When you say when you got on a</p> <p>3 boat like --</p> <p>4 A. When I was first started.</p> <p>5 Q. First hired. Okay.</p> <p>6 Is there a book on the boat</p> <p>7 that has that in it?</p> <p>8 A. It's posted on every wall.</p> <p>9 Q. Help me understand that.</p> <p>10 What's posted on every wall?</p> <p>11 A. That this one right here, the</p> <p>12 deckhands is posted on the galley wall.</p> <p>13 Q. On the galley wall?</p> <p>14 A. Yeah. To see what we have to</p> <p>15 do for house cleaning and maintenance.</p> <p>16 Q. There's like a bulletin board</p> <p>17 of some sort in the galley?</p> <p>18 A. Yes.</p> <p>19 Q. That has that section about</p> <p>20 deckhands?</p> <p>21 A. Yes.</p> <p>22 Q. Like all of the pages you can</p> <p>23 read?</p> <p>24 A. Not all of the pages, just this</p> <p>25 page.</p>	<p style="text-align: right;">Page 60</p> <p>1 version of what our responsibilities are.</p> <p>2 Q. Yeah. So this 6.13 says,</p> <p>3 "Mate/Captain/Elite Captain," on top,</p> <p>4 right?</p> <p>5 A. Yes.</p> <p>6 Q. Is this what's posted in the</p> <p>7 galley?</p> <p>8 A. No.</p> <p>9 Q. Is something else that looks</p> <p>10 like this?</p> <p>11 A. Yes.</p> <p>12 Q. Okay. Do you know how many</p> <p>13 pages it is?</p> <p>14 A. No.</p> <p>15 Q. Is -- besides those three</p> <p>16 things about deckhands, engineers, and the</p> <p>17 mate/captain, is there anything else posted</p> <p>18 in the galley?</p> <p>19 A. Drug and alcohol uses like none</p> <p>20 of that. Just small things on the wall,</p> <p>21 pretty much.</p> <p>22 Q. All right. Is there one place</p> <p>23 in the galley that all of this stuff is</p> <p>24 posted?</p> <p>25 A. Yes.</p>
<p style="text-align: right;">Page 59</p> <p>1 Q. Just the first page?</p> <p>2 A. Yes.</p> <p>3 Q. And if you go just another</p> <p>4 section down in Exhibit 4.</p> <p>5 A. 6.14 or?</p> <p>6 Q. It's 6.13 and it says deckhand.</p> <p>7 Should say, "Mate/Captain/Elite Captain."</p> <p>8 A. Yes.</p> <p>9 Q. Do you see that?</p> <p>10 A. Yes.</p> <p>11 Q. Is that also posted in the</p> <p>12 galley?</p> <p>13 A. No.</p> <p>14 Q. Okay, just the deckhand one?</p> <p>15 A. Yes.</p> <p>16 Q. Anything about the engineers'</p> <p>17 responsibilities posted in the galley?</p> <p>18 A. Yes.</p> <p>19 Q. So it looks similar to this?</p> <p>20 A. Yes.</p> <p>21 Q. So besides deckhand and</p> <p>22 engineer, are there any other sections that</p> <p>23 look like this that are posted in the</p> <p>24 galley?</p> <p>25 A. Captain and mate, just shorter</p>	<p style="text-align: right;">Page 61</p> <p>1 Q. Like a board on the wall, or a</p> <p>2 glass case on the wall or something like</p> <p>3 that?</p> <p>4 A. Yes.</p> <p>5 Q. All right. One day we'll have</p> <p>6 a chance to go and look at the tug and I'll</p> <p>7 know what you're talking about.</p> <p>8 A. Okay.</p> <p>9 Q. I'm just trying to understand</p> <p>10 what you remember of it.</p> <p>11 A. I got you.</p> <p>12 Q. Just looking at the titles on</p> <p>13 the first page of Exhibit 4. Is the</p> <p>14 information about 7.2, distracted</p> <p>15 operations, posted on it -- on that galley</p> <p>16 wall?</p> <p>17 A. I don't know.</p> <p>18 Q. Do you know whether any of this</p> <p>19 other information that is listed on the</p> <p>20 first page of Exhibit 4 --</p> <p>21 A. I don't know.</p> <p>22 Q. Let me finish the question.</p> <p>23 Is posted on the galley wall?</p> <p>24 A. I don't know.</p> <p>25 Q. You can pass that back to me,</p>

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<p>1 please. Thank you.</p> <p>2 A. You're welcome.</p> <p>3 Q. I'm going to pass over to you</p> <p>4 Exhibit 6.</p> <p>5 MR. RODGERS: Six?</p> <p>6 MR. CHAPMAN: Six.</p> <p>7 Q. Which was a document produced</p> <p>8 to us by Carver, which looks like the</p> <p>9 electronic version of the daily log for the</p> <p>10 Mackenzie Rose from June 12th, 2024,</p> <p>11 through June 16th, 2024.</p> <p>12 Have you ever seen this before?</p> <p>13 A. No.</p> <p>14 Q. Does anybody ever ask you for</p> <p>15 information to put into the daily log?</p> <p>16 A. No.</p> <p>17 Q. Who makes the daily log</p> <p>18 entries?</p> <p>19 A. I don't know.</p> <p>20 Q. So if you could turn to -- each</p> <p>21 of those pages has a number at the bottom.</p> <p>22 If you could turn to the one marked Carver,</p> <p>23 there's four zeros and then 56.</p> <p>24 If you look at the bottom of</p> <p>25 that page, there's a entry at 1630. It</p>	<p>1 MR. CHAPMAN: Can I finish?</p> <p>2 MR. RODGERS: Yeah.</p> <p>3 MR. CHAPMAN: Thank you.</p> <p>4 MR. RODGERS: Sure.</p> <p>5 Q. Did he every say anything about</p> <p>6 switching the autopilot back over to hand</p> <p>7 steering --</p> <p>8 MR. RODGERS: Objection.</p> <p>9 Q. -- in --</p> <p>10 MR. RODGERS: Objection.</p> <p>11 Foundation.</p> <p>12 Q. -- in the aftermath of the</p> <p>13 incident?</p> <p>14 MR. RODGERS: Okay. You can</p> <p>15 answer.</p> <p>16 A. No.</p> <p>17 MR. RODGERS: Apologies, Jim.</p> <p>18 Q. Did he ever say anything about</p> <p>19 having taken a photograph of the bridge?</p> <p>20 MR. RODGERS: Same objection.</p> <p>21 You can answer if you know.</p> <p>22 A. No.</p> <p>23 Q. You can hand that back to me,</p> <p>24 please. Thank you.</p> <p>25 A. Welcome.</p>
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<p>1 says "Incident." And I'll just read it.</p> <p>2 "Incident Norfolk Virginia.</p> <p>3 Mate James Morrissey reports the autopilot</p> <p>4 was not completely turned off. He was able</p> <p>5 to correct and switch back over to hand</p> <p>6 steering and began backing on the weeks 281</p> <p>7 barge and maneuvered the barge alongside</p> <p>8 fendering on the Northend P-B-L-L-R bridge.</p> <p>9 Photo taken, proceeds slowly away from</p> <p>10 bridge."</p> <p>11 You told us what you remember</p> <p>12 Captain Jimmy Morrissey telling you. Did he</p> <p>13 ever say anything to you in the aftermath</p> <p>14 after this incident that the autopilot was</p> <p>15 not completely turned off?</p> <p>16 A. No.</p> <p>17 MR. RODGERS: Objection.</p> <p>18 Foundation.</p> <p>19 You can answer. You already</p> <p>20 did.</p> <p>21 A. No.</p> <p>22 Q. Did he ever say anything about</p> <p>23 switching the autopilot over --</p> <p>24 MR. RODGERS: Same objection.</p> <p>25 You can answer.</p>	<p>1 Q. Is there a journal or a logbook</p> <p>2 in the lower wheelhouse of the Mackenzie</p> <p>3 Rose?</p> <p>4 A. Yes.</p> <p>5 Q. There's like a big book.</p> <p>6 There's like a date of every page for the</p> <p>7 entire year?</p> <p>8 A. Yes.</p> <p>9 Q. Right? Do you ever make</p> <p>10 entries in that logbook?</p> <p>11 A. No.</p> <p>12 Q. Do you ever review what's</p> <p>13 entered in the logbook?</p> <p>14 A. No.</p> <p>15 Q. You never just sort of flip</p> <p>16 through it, or it's just there?</p> <p>17 A. It's just there.</p> <p>18 Q. Do you know who makes entries</p> <p>19 in that logbook?</p> <p>20 A. No, sir.</p> <p>21 Q. Have you ever seen anybody make</p> <p>22 entries in that logbook?</p> <p>23 A. No.</p> <p>24 Q. I'm going to pass you Exhibit</p> <p>25 23. Again, it was a document produced to</p>

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<p>1 us by Carver covering June 12th, 2024</p> <p>2 through June 16th, 2024.</p> <p>3 MR. RODGERS: Just -- objection.</p> <p>4 Foundation on any questions so I</p> <p>5 don't have to keep repeating it and</p> <p>6 interrupt you. I'll just have a</p> <p>7 standing objection for Exhibit 23 as</p> <p>8 to foundation.</p> <p>9 A. Gotcha.</p> <p>10 Q. So the logbook that you seen in</p> <p>11 the lower wheelhouse in Mackenzie Rose,</p> <p>12 it's like a cloth-bound book?</p> <p>13 A. Yes.</p> <p>14 Q. All right. And is it typically</p> <p>15 opened to the current date the page is open</p> <p>16 to?</p> <p>17 A. Yeah.</p> <p>18 Q. I realized you told us that you</p> <p>19 haven't read it, you haven't ever made any</p> <p>20 entries in it, but does Exhibit 23 appear</p> <p>21 to be to you photocopies of some pages from</p> <p>22 the 2024 logbook?</p> <p>23 A. I don't know because I don't</p> <p>24 read the book, like I said before.</p> <p>25 Q. Or is the format the way the</p>	<p>1 A. Yeah.</p> <p>2 Q. I'll just read it. "Co-Captain</p> <p>3 reports steering went hard over and he was</p> <p>4 backing and we tapped the Northend</p> <p>5 P-B-L-R-R Bridge."</p> <p>6 Did I read that correctly?</p> <p>7 A. Yes.</p> <p>8 Q. Now, again, just -- I'm</p> <p>9 revisiting your conversation with Captain</p> <p>10 Jimmy Morrisey, okay?</p> <p>11 Did he ever say to you that the</p> <p>12 flotilla, the tug and the barge had tapped</p> <p>13 the Railroad Bridge?</p> <p>14 A. No.</p> <p>15 Q. Did he ever say that the</p> <p>16 steering went hard over?</p> <p>17 A. No.</p> <p>18 Q. At any time while you were on</p> <p>19 that voyage, did you ever hear or learn</p> <p>20 that either the captain or the mate had</p> <p>21 contacted Brian Moore or Lenny Baldassare</p> <p>22 to report the incident?</p> <p>23 A. I don't know.</p> <p>24 Q. When you say "I don't know,"</p> <p>25 does that mean you just have no knowledge</p>
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<p>1 logbook looks?</p> <p>2 A. Yes.</p> <p>3 Q. All right. It's got dated at</p> <p>4 the top to tell you how many days are left</p> <p>5 in the year, that sort of thing?</p> <p>6 A. Yes.</p> <p>7 Q. Okay. And if you could turn to</p> <p>8 the -- all of the pages have a Carver</p> <p>9 number at the bottom. You could turn to</p> <p>10 page 242.</p> <p>11 MR. RODGERS: Is it</p> <p>12 number -- that's the -- just the</p> <p>13 number that we marked as lawyers.</p> <p>14 MR. CHAPMAN: 242?</p> <p>15 MR. RODGERS: Yeah. It's</p> <p>16 easier to refer.</p> <p>17 MR. CHAPMAN: Yeah.</p> <p>18 Q. That appears to be the entry</p> <p>19 for Saturday June 15th, 2024, correct?</p> <p>20 A. Yes.</p> <p>21 Q. Okay. I'm not saying you've</p> <p>22 ever seen it before, but I do want you to</p> <p>23 look at the entry that says 1630 in the</p> <p>24 left-hand column.</p> <p>25 You see that?</p>	<p>1 of it, if that happened or that you don't</p> <p>2 remember?</p> <p>3 A. I just have no knowledge of it.</p> <p>4 Q. Okay.</p> <p>5 MR. RODGERS: Was that Exhibit</p> <p>6 22?</p> <p>7 MR. CHAPMAN: 23.</p> <p>8 MR. RODGERS: 23, okay.</p> <p>9 Q. Do you know approximately when</p> <p>10 you last worked with Captain Chris Miller</p> <p>11 on the MacKenzie Rose?</p> <p>12 A. No, sir.</p> <p>13 Q. Do you know if it was this year</p> <p>14 2025?</p> <p>15 A. No, I don't think so.</p> <p>16 Q. What about Engineer Jason</p> <p>17 McGrath?</p> <p>18 A. Nope.</p> <p>19 Q. You don't recall?</p> <p>20 A. No, I do not recall.</p> <p>21 Q. When you were first hired, did</p> <p>22 you have to undergo any formal training</p> <p>23 before you could start crewing on the</p> <p>24 Mackenzie Rose?</p> <p>25 A. What do you mean by that?</p>

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<p>1 Q. I'm just asking you, before you</p> <p>2 were able to start crewing, was there any</p> <p>3 formal training that you had to undergo</p> <p>4 provided by Carver?</p> <p>5 A. No.</p> <p>6 Q. Like sitting down in a</p> <p>7 classroom or taking a quiz, that sort of</p> <p>8 thing?</p> <p>9 A. No.</p> <p>10 Q. Okay. Were you provided any</p> <p>11 handbooks or other materials on doing your</p> <p>12 job as a deckhand?</p> <p>13 A. No.</p> <p>14 Q. You described the deckhand</p> <p>15 responsibilities as something that's posted</p> <p>16 in the galley. Were you ever given a</p> <p>17 hardcopy of that?</p> <p>18 A. No.</p> <p>19 MR. RODGERS: Objection to</p> <p>20 form.</p> <p>21 Q. Did you ever read it in the</p> <p>22 galley?</p> <p>23 A. No.</p> <p>24 Q. Did -- while you are performing</p> <p>25 crew duties or while you were assigned</p>	<p>1 Question for you: What does</p> <p>2 this have to do with this the bridge?</p> <p>3 Q. Okay. Was there any training</p> <p>4 provided on performing duties as a lookout</p> <p>5 on the barge?</p> <p>6 A. The barge that we was pushing?</p> <p>7 Q. No. Not necessarily that</p> <p>8 barge. I'm just talking generally. Was</p> <p>9 there any training provided on performing</p> <p>10 duties as a lookout?</p> <p>11 A. Just like standing out on the</p> <p>12 barge, looking out for stuff.</p> <p>13 That's what you mean?</p> <p>14 Q. Yeah, however you think of it,</p> <p>15 yeah. Uh-huh. I'm just asking if you --</p> <p>16 A. So we don't have a lookout</p> <p>17 unless they need us out on the barge. We</p> <p>18 only tell them distance or how far they're</p> <p>19 away from each side so they don't hit or</p> <p>20 crash to nothing.</p> <p>21 Q. Like if you were a lookout?</p> <p>22 A. Sure.</p> <p>23 Q. Okay.</p> <p>24 A. You can say a lookout.</p> <p>25 Q. All right. And who would</p>
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<p>1 during a rotation, is there training</p> <p>2 provided by either the mate or the master</p> <p>3 of the crew?</p> <p>4 A. What do you mean by that?</p> <p>5 Q. Well, I'm just trying to figure</p> <p>6 out; to get the crew together and, you</p> <p>7 know, review something, review a safety</p> <p>8 issue, review how to get the job done</p> <p>9 efficiently, any sort of --</p> <p>10 A. Like safety meetings?</p> <p>11 Q. Yeah.</p> <p>12 A. Yes.</p> <p>13 Q. Okay. And how frequently were</p> <p>14 those done?</p> <p>15 A. Quite frequently.</p> <p>16 Q. Like what does that mean?</p> <p>17 Everyday?</p> <p>18 A. Not everyday, like every week</p> <p>19 or so, give or take.</p> <p>20 Q. And who leads those?</p> <p>21 A. Either the mate or the captain.</p> <p>22 Q. Okay. Are there any written</p> <p>23 test or quizzes or that sort of thing that</p> <p>24 you take?</p> <p>25 A. No.</p>	<p>1 assign you as a lookout?</p> <p>2 A. That's our job to do that.</p> <p>3 Just to give them distance, but if the</p> <p>4 captain want us to be out there, he will</p> <p>5 say, "Hey, can you go out on the barge and</p> <p>6 look out? Make sure I don't hit nothing."</p> <p>7 Q. Now, on the day that</p> <p>8 the -- this incident with the Belt Line</p> <p>9 Bridge, you weren't assigned as a lookout?</p> <p>10 A. No, sir.</p> <p>11 Q. Was there any discussion before</p> <p>12 you got underway about the need for a</p> <p>13 lookout during any part of the voyage down</p> <p>14 river?</p> <p>15 A. No.</p> <p>16 Q. Do you ever kind of, "Hey, cap,</p> <p>17 do you want me to serve as a lookout?" In</p> <p>18 these circumstances.</p> <p>19 A. No.</p> <p>20 Q. So you'll only do it if the</p> <p>21 captain tells you to?</p> <p>22 A. Yes.</p> <p>23 Q. If you are posted as a lookout</p> <p>24 by the captain, is it in you're pushing a</p> <p>25 barge, is it always to the head end of the</p>

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<p>1 barge?</p> <p>2 A. Yes.</p> <p>3 Q. Have you ever been posted as a</p> <p>4 lookout for a bridge transit?</p> <p>5 A. No.</p> <p>6 Q. Before getting underway with</p> <p>7 the barge on June 15th, 2024, was there any</p> <p>8 kind of, I don't know, voyage meeting, some</p> <p>9 kind of planning meeting between you and</p> <p>10 the mate and perhaps the engineer on your</p> <p>11 watch?</p> <p>12 A. No.</p> <p>13 Q. Is there ever such a meeting?</p> <p>14 A. No.</p> <p>15 Q. Has Carver ever sent you</p> <p>16 anywhere? Like, I don't know, like a</p> <p>17 deckhand school, whatever you think of it</p> <p>18 that way, for training?</p> <p>19 A. No.</p> <p>20 Q. With these safety meeting you</p> <p>21 were telling us that were provided by</p> <p>22 either the captain or the mate, is there</p> <p>23 something that you sign off on that I</p> <p>24 received some training?</p> <p>25 A. They signed something off on</p>	<p>1 Q. -- right. If I understand what</p> <p>2 you said.</p> <p>3 Is there something that then</p> <p>4 you do in Helm to say, "Yes, I got this</p> <p>5 training"?</p> <p>6 A. No.</p> <p>7 Q. Because you told us earlier you</p> <p>8 don't ever make any entries?</p> <p>9 A. Yeah, I don't make no entries.</p> <p>10 Q. Okay.</p> <p>11 MR. RODGERS: Is this working</p> <p>12 yet?</p> <p>13 THE REPORTER: No.</p> <p>14 MR. RODGERS: Could you</p> <p>15 just -- I'm sorry.</p> <p>16 Can you just read the last</p> <p>17 question and the answer?</p> <p>18 (Whereupon, the above record</p> <p>19 was read back by the court reporter.)</p> <p>20 MR. RODGERS: Okay, is that --</p> <p>21 A. Because I don't make entries in</p> <p>22 Helm.</p> <p>23 MR. RODGERS: Is what you</p> <p>24 remember saying?</p> <p>25 A. Yes.</p>
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<p>1 him, but we -- like, they signed it. Like,</p> <p>2 we all listen to the safety meeting and all</p> <p>3 of that, so.</p> <p>4 Q. So you would have to make an</p> <p>5 entry or somebody does that?</p> <p>6 A. No. The captain make the</p> <p>7 entry. After they -- after we go over it,</p> <p>8 we all sign it.</p> <p>9 Q. So you do sign something in</p> <p>10 Helm?</p> <p>11 A. I guess so.</p> <p>12 MR. RODGERS: Don't guess.</p> <p>13 Q. I'm trying to understand. You</p> <p>14 told us that Helm is available through some</p> <p>15 laptop?</p> <p>16 A. Yes.</p> <p>17 Q. In the lower wheelhouse, right?</p> <p>18 A. Yes.</p> <p>19 Q. So if there's some, call it</p> <p>20 safety training that's provided by the</p> <p>21 company, or provided by the mate or the</p> <p>22 master during your watch, they would make</p> <p>23 some entry in the Helm system about</p> <p>24 that --</p> <p>25 A. Yes.</p>	<p>1 MR. RODGERS: Okay.</p> <p>2 Q. Is there any, I don't know what</p> <p>3 you call it, operating procedures, standard</p> <p>4 operating procedure that Carver has that</p> <p>5 you know of about approaching or transiting</p> <p>6 bridges?</p> <p>7 A. No.</p> <p>8 Q. When you're pushing a barge?</p> <p>9 A. No.</p> <p>10 Q. Do you know of any company</p> <p>11 rules, or guidelines or protocols regarding</p> <p>12 assigning lookouts during the transit under</p> <p>13 bridges?</p> <p>14 A. No.</p> <p>15 THE REPORTER: Under bridges or</p> <p>16 on the bridges?</p> <p>17 MR. CHAPMAN: Under bridges.</p> <p>18 Uh-huh.</p> <p>19 Q. While you've been a deckhand,</p> <p>20 have you ever been given the opportunity to</p> <p>21 take the wheel of the Tug Mackenzie Rose?</p> <p>22 A. No.</p> <p>23 Q. So there is no occasion where</p> <p>24 you've actually been at the controls</p> <p>25 operating the tug --</p>

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<p>1 A. Yes.</p> <p>2 Q. -- while you have been a</p> <p>3 deckhand?</p> <p>4 A. Yes, no occasions.</p> <p>5 Q. Do you aspire to be a master or</p> <p>6 a mate?</p> <p>7 A. No.</p> <p>8 MR. RODGERS: Objection to</p> <p>9 form.</p> <p>10 You can answer.</p> <p>11 Q. It's all right.</p> <p>12 A. No.</p> <p>13 MR. RODGERS: We're not going</p> <p>14 to hold you to that.</p> <p>15 Q. Just to be quite --</p> <p>16 MR. RODGERS: Object if you</p> <p>17 ever want to.</p> <p>18 Q. I just want to be certain.</p> <p>19 You've never done any control or operate</p> <p>20 the tug.</p> <p>21 Have you ever used the</p> <p>22 autopilot in the upper or lower wheelhouse</p> <p>23 of the Tug Mackenzie Rose?</p> <p>24 A. No.</p> <p>25 Q. Do you know how the autopilot</p>	<p>1 Bridge that the autopilot system was</p> <p>2 engaged for the transit down the Southern</p> <p>3 Branch of the Elizabeth River?</p> <p>4 A. No.</p> <p>5 Q. You told us that you know who</p> <p>6 Mr. Baldassare is, right?</p> <p>7 A. Yes.</p> <p>8 Q. Have you ever seen him aboard</p> <p>9 the Tug Mackenzie Rose while you've been</p> <p>10 serving as a deckhand?</p> <p>11 A. Like once.</p> <p>12 Q. And was that at Staten Island</p> <p>13 or?</p> <p>14 A. Yes, in Staten Island.</p> <p>15 Q. Was the tug underway somewhere,</p> <p>16 or?</p> <p>17 A. No.</p> <p>18 Q. Do you know the purpose that he</p> <p>19 had come aboard the tug?</p> <p>20 A. No.</p> <p>21 Q. Was he there long?</p> <p>22 A. No.</p> <p>23 Q. Did you talk to him on that one</p> <p>24 occasion?</p> <p>25 A. I met him and said, "Hey, my</p>
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<p>1 works?</p> <p>2 A. Yes.</p> <p>3 Q. Can you just give us a brief</p> <p>4 description of how you understand it works?</p> <p>5 A. You put it on autopilot, you do</p> <p>6 clicks to the port or the standby side and</p> <p>7 that's pretty much it.</p> <p>8 Q. And it should stay on course?</p> <p>9 A. Yes.</p> <p>10 MR. RODGERS: Objection. To</p> <p>11 his knowledge, Jim.</p> <p>12 MR. CHAPMAN: Sure. I'll take</p> <p>13 that qualification because I think</p> <p>14 it's implied in the question.</p> <p>15 Q. But to your knowledge --</p> <p>16 A. Yeah, to my knowledge, yes.</p> <p>17 Q. -- the autopilot is supposed</p> <p>18 to keep you going in the course that you</p> <p>19 set it up --</p> <p>20 MR. RODGERS: Objection to</p> <p>21 form.</p> <p>22 Q. -- right?</p> <p>23 A. Yes.</p> <p>24 Q. Did you ever hear at any time</p> <p>25 after the incident involving the Belt Line</p>	<p>1 name's Jark," and he told me his name.</p> <p>2 Q. That was it, just pleasantries?</p> <p>3 A. That was it, yes sir.</p> <p>4 Q. Okay. Was that before or after</p> <p>5 the incident involving the Belt Line</p> <p>6 Bridge?</p> <p>7 A. Before.</p> <p>8 Q. Soon after you became an</p> <p>9 employee of Carver?</p> <p>10 A. Yes.</p> <p>11 Q. Have you ever been posted as a</p> <p>12 lookout on the head end of a barge during a</p> <p>13 bridge transit?</p> <p>14 A. No.</p> <p>15 MR. RODGERS: Objection. Asked</p> <p>16 and answered.</p> <p>17 A. No.</p> <p>18 MR. RODGERS: You can --</p> <p>19 Q. Before getting your merchant</p> <p>20 mariners document, did you undergo any</p> <p>21 training, formal training, in the duties of</p> <p>22 an able-bodied seaman?</p> <p>23 A. Yes.</p> <p>24 Q. And was it a school you</p> <p>25 attended?</p>

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<p>1 A. Yes.</p> <p>2 Q. What was the name of the</p> <p>3 school?</p> <p>4 A. Merchant Marine School in</p> <p>5 Panama City.</p> <p>6 Q. How long was the course?</p> <p>7 A. It was all day, just a day</p> <p>8 course.</p> <p>9 Q. Did you have to take an</p> <p>10 examination at the end of it?</p> <p>11 A. Yes.</p> <p>12 Q. So I assume that you must have</p> <p>13 done some studying before you went and took</p> <p>14 the class?</p> <p>15 A. Well, the class was a week</p> <p>16 long. We had to take the test in person,</p> <p>17 so.</p> <p>18 Q. So you could take the class</p> <p>19 like online?</p> <p>20 A. Yes, online.</p> <p>21 Q. Okay.</p> <p>22 A. That's when COVID was around,</p> <p>23 so not a lot of people could be around each</p> <p>24 other.</p> <p>25 Q. Has Captain Jimmy Morrisey been</p>	<p>1 A. No.</p> <p>2 Q. I know you told us that you</p> <p>3 stated in late April with Carver, and this</p> <p>4 incident was mid June, so about six weeks</p> <p>5 later.</p> <p>6 During that period of time, did</p> <p>7 you hear from anybody on the Tug Mackenzie</p> <p>8 Rose that there were any problems or</p> <p>9 difficulties with the autopilot system?</p> <p>10 A. No.</p> <p>11 MR. CHAPMAN: Why don't we take</p> <p>12 a break, a brief break?</p> <p>13 I doubt that I have anymore</p> <p>14 questions, but I just want to make</p> <p>15 sure that there's something that I</p> <p>16 haven't overlooked and there might be</p> <p>17 some folks on the call that have a</p> <p>18 question or two.</p> <p>19 MR. RODGERS: Say that again?</p> <p>20 MR. CHAPMAN: I said there</p> <p>21 might be some folks on the call that</p> <p>22 have a question or two.</p> <p>23 MR. RODGERS: All right. So</p> <p>24 you want to take five minutes? Is</p> <p>25 that enough?</p>
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<p>1 sailing your whole life that you know?</p> <p>2 A. I think so.</p> <p>3 MR. RODGERS: Don't guess.</p> <p>4 A. That I know of.</p> <p>5 Q. Did he encourage you to get</p> <p>6 your AB ticket?</p> <p>7 A. No.</p> <p>8 Q. In terms of the safety training</p> <p>9 on the boat, while you're on watch, either</p> <p>10 by the master or the mate, can you recall</p> <p>11 ever having any specific training on bridge</p> <p>12 transits?</p> <p>13 A. No. You're talking a lot about</p> <p>14 safety, but that's irrelevant to the</p> <p>15 bridge.</p> <p>16 MR. RODGERS: No.</p> <p>17 Just -- you're here to just answer</p> <p>18 the question.</p> <p>19</p> <p>20 A. Yes, sir.</p> <p>21 Q. Do you know of any Carver</p> <p>22 Company policy about posting of dedicated</p> <p>23 lookout to the head end of a barge --</p> <p>24 A. No.</p> <p>25 Q. -- during a voyage?</p>	<p>1 MR. CHAPMAN: Yeah. I think</p> <p>2 that'd probably be sufficient.</p> <p>3 MR. RODGERS: Okay.</p> <p>4 THE VIDEOGRAPHER: We are going</p> <p>5 off the record. The time is 11:50</p> <p>6 a.m.</p> <p>7 (Whereupon, a short recess was</p> <p>8 held.)</p> <p>9 THE VIDEOGRAPHER: Beginning</p> <p>10 Media Number 2.</p> <p>11 We are back on the record. The</p> <p>12 time is 12:02 p.m.</p> <p>13 Q. Mr. Morrisey, I'm going to hand</p> <p>14 you, again, Exhibit 4 and just a couple of</p> <p>15 things I want to clarify.</p> <p>16 You told us that the sections</p> <p>17 6.12 and 6.13 are posted in the galley on</p> <p>18 some kind of bulletin board and the -- your</p> <p>19 memory is that there's also one relating to</p> <p>20 the engineer's responsibilities, right?</p> <p>21 A. Yes.</p> <p>22 Q. In terms of the rest of the</p> <p>23 information that's contained in Exhibit 4,</p> <p>24 would -- do you know where it lives, where</p> <p>25 you would go access it with the company?</p>

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<p style="text-align: right;">Page 86</p> <p>1 A. Honestly, I don't know.</p> <p>2 Q. Okay. You've never had any</p> <p>3 reason to access it?</p> <p>4 A. Yes, no reason to access.</p> <p>5 Q. Okay, all right.</p> <p>6 MR. CHAPMAN: That's all I got.</p> <p>7 A. Okay.</p> <p>8 THE REPORTER: All good.</p> <p>9 Counsel, you would like a rough</p> <p>10 draft, both roughs and?</p> <p>11 MR. RODGERS: Yeah. Okay. I</p> <p>12 have no follow-up, so we're done,</p> <p>13 right?</p> <p>14 MR. CHAPMAN: Yep.</p> <p>15 MR. RODGERS: Jim, it's closed?</p> <p>16 MR. CHAPMAN: Yeah. And you</p> <p>17 need 30 minutes or so with --</p> <p>18 MR. RODGERS: Well, that's the</p> <p>19 question.</p> <p>20 MR. CHAPMAN: -- the court</p> <p>21 reporter?</p> <p>22 MR. RODGERS: Okay.</p> <p>23 MR. CHAPMAN: I was saying we</p> <p>24 just go --</p> <p>25 MR. RODGERS: You want to have</p>	<p style="text-align: right;">Page 88</p> <p>1 A C K N O W L E D G M E N T</p> <p>2</p> <p>3 STATE OF NEW YORK)</p> <p>4 :ss</p> <p>5 COUNTY OF)</p> <p>6</p> <p>7 I, JARKEIS MORRISEY, hereby certify</p> <p>8 that I have read the transcript of my</p> <p>9 testimony taken under oath on 04/30/2025;</p> <p>10 that the transcript is a true, complete and</p> <p>11 correct record of what was asked, answered</p> <p>12 and said during this proceeding, and that</p> <p>13 the answers on the record as given by me</p> <p>14 are true and correct.</p> <p>15</p> <p>16</p> <p>17 -----</p> <p>18 JARKEIS MORRISEY</p> <p>19</p> <p>20 Signed and subscribed to</p> <p>21 before me this ____ day</p> <p>22 of _____, 2025</p> <p>23</p> <p>24 _____</p> <p>25 Notary Public</p>
<p style="text-align: right;">Page 87</p> <p>1 lunch or do you want be -- or do you</p> <p>2 want just power through because it'll</p> <p>3 be short?</p> <p>4 MR. CHAPMAN: I think his depth</p> <p>5 is likely to be a little shorter than</p> <p>6 Jarkeis, but I don't know how much</p> <p>7 shorter. But if you want to take --</p> <p>8 THE REPORTER: Can I</p> <p>9 probably --</p> <p>10 MR. CHAPMAN: Are we on the</p> <p>11 record?</p> <p>12 THE REPORTER: Yes.</p> <p>13 MR. CHAPMAN: Sorry about that.</p> <p>14 MR. RODGERS: Oh, sorry.</p> <p>15 MR. CHAPMAN: We'll cut that</p> <p>16 off.</p> <p>17 THE VIDEOGRAPHER: This is the</p> <p>18 end of the deposition of Jarkeis</p> <p>19 Jamal Bass Morris?</p> <p>20 MR. CHAPMAN: Morrisey.</p> <p>21 THE VIDEOGRAPHER: The time is</p> <p>22 12:04 p.m.</p> <p>23 (Thereupon, the examination was</p> <p>24 concluded at 12:04 P.M.)</p> <p>25</p>	<p style="text-align: right;">Page 89</p> <p>1 C E R T I F I C A T E</p> <p>2</p> <p>3 STATE OF NEW YORK)</p> <p>4 :ss</p> <p>5 COUNTY OF SUFFOLK)</p> <p>6</p> <p>7 I, LARIN KAYWOOD, a Notary Public within</p> <p>8 and for the State of New York, do hereby</p> <p>9 certify:</p> <p>10 That the witness whose examination is</p> <p>11 hereinbefore set forth was duly sworn and</p> <p>12 that such an examination is a true record</p> <p>13 of the testimony given by such a witness.</p> <p>14 I further certify that I am not</p> <p>15 related to any of these parties to this</p> <p>16 action by blood or marriage, and that I am</p> <p>17 not in any way interested in the outcome of</p> <p>18 this matter.</p> <p>19 IN WITNESS WHEREOF, I have hereunto</p> <p>20 set my hand this 7th day of May, 2025.</p> <p>21</p> <p>22</p> <p>23 <i>Larin Kaywood</i></p> <p>24 _____</p> <p>25 Larin Kaywood</p>

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1 Errata Sheet
2
3 NAME OF CASE: IN THE MATTER OF COEYMANS MARINE TOWING, LLC
4 DATE OF DEPOSITION: 04/30/2025
5 NAME OF WITNESS: JARKEIS MORRISEY
6 Reason Codes:
7 1. To clarify the record.
8 2. To conform to the facts.
9 3. To correct transcription errors.
10 Page ____ Line ____ Reason ____
11 From ____ to ____
12 Page ____ Line ____ Reason ____
13 From ____ to ____
14 Page ____ Line ____ Reason ____
15 From ____ to ____
16 Page ____ Line ____ Reason ____
17 From ____ to ____
18 Page ____ Line ____ Reason ____
19 From ____ to ____
20 Page ____ Line ____ Reason ____
21 From ____ to ____
22 Page ____ Line ____ Reason ____
23 From ____ to ____
24
25

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